# Rule 1162 Polyester Resin Operations<sup>1</sup>

# (A) Purpose

- (1) Purpose
  - (a) The purpose of this rule is to limit the emissions of Volatile Organic Compounds (VOCs) from Polyester Resin Operations, Fiberglass Boat Manufacturing Operations, organic solvent cleaning, and the storage and disposal of solvents and waste solvent materials associated with such operations. [Updated to reference existing applicability to fiberglass boat manufacturing operations and solvent cleaning operations.]

### (2) Applicability

- (a) This rule is applicable to the manufacture of products from, or the use of, pPolyester Rresin mMaterial, including rRepair, rework, or touch-up activities for commercial, military, or industrial use.
- (b) This rule is applicable to organic solvent cleaning, and the storage and disposal of all solvents and waste solvent materials associated with Polyester Resin Operations and Fiberglass Boat Manufacturing Operations. [Updated to reference existing applicability to solvent cleaning operations.]
- (cb) This rule is applicable to all new and existing operations.

#### (3) Exemptions

- The provisions of this rule, other than the record keeping requirements of subsection (D)(1), shall not apply to any pPolyester rResin oOperation where the volume of pPolyester rResin mMaterials used is less than 20 gallons per month.
- (b) The requirements of <u>sub</u>section<u>s</u> (C)(1) and (C)(2) shall not apply to <u>pP</u>in-<u>sS</u>triping provided that the total amount of the <u>gG</u>el <u>eC</u>oat materials sprayed does not exceed one (1) gallon per day per facility.
- (c) For Fiberglass Boat Manufacturing Operations, Production Resins
  (including Skin Coats) that must meet the specifications for use in military

<sup>&</sup>lt;sup>1</sup> This Rule is primarily derived from SJVUAPCD Rule 4684 – *Polyester Resin Operations* unless otherwise noted.

vessels or must be approved by the United States Coast Guard for use in the construction of lifeboats, rescue Boats, and other life-saving appliances approved under Title 46, Chapter 1, Subchapter Q of the CFR (commencing with §159), or to the construction of small passenger vessels regulated by Title 46, Chapter 1, Subchapter T of the CFR (commencing with §175) are exempt from the requirements of subsection (C)(3)(b). Production Resins that meet these criteria shall be applied with non-atomizing Resin application equipment. [Derived from CTG for Fiberglass Boat Manufacturing.]

(d) The solvent cleaning provisions of subsection (C)(6) shall not apply to the following cleaning applications: solar cells, laser hardware, scientific instruments, high precision optics, laboratory tests and analyses, or bench scale or research and development projects. [Derived from SJVUAPCD]

Rule 4684 § 4.3.]

# (B) Definitions

For the purpose of this rule the following definitions shall apply: The definitions contained in District Rule 102 – Definition of Terms shall apply unless the term is otherwise defined herein: [Definitions that are commonly used throughout the MDAQMD rule book have been relocated to existing Rule 102 which was amended June 12, 2017.]

- (1) (1) Air-Assisted Airless Spray A coating application system in which the coating fluid is supplied to the gun under fluid pressure and air is combined at the spray cap.
- (2) Application Equipment A device, including, but not limited to, a spray gun, brush, and roller, used to apply adhesives, coatings, or inks. [Derived from SJVUAPCD Rule 4684 §3.2.]
- (23) Assembly Adhesive A chemical used in joining fiberglass, metal, foam, or wood parts to another to form a temporary or permanently bonded assembly.

  Assembly Adhesives include, but are not limited to, methacrylate adhesives and putties made from Polyester or Vinylester Resin mixed with inert Filler or fibers.

  [Derived from VVVV definitions and SJVUAPCD Rule 4684 §3.4.]
- Atomized Resin Application A Rresin application technology in which the Resin leaves the application equipment and breaks into droplets or an aerosol as it travels from the application equipment to the surface of the part. Atomized Rresin Aapplication includes, but is not limited to, Resin spray guns and Resin chopper spray guns.
- (53) <u>Boat</u> Any type of vessel, other than a seaplane, that can be used for transportation on the water.

- (4) <u>Boat Manufacturing Facility</u>—A facility that manufactures the hulls or decks of boats from fiberglass or aluminum or assembles boats from premanufactured hulls or decks, or builds molds to make fiberglass hulls or decks. A facility that manufactures only parts of boats (such as hatches, seats, or lockers) or boat trailers, but no boat hulls or decks or molds for fiberglass boat hulls or decks, is not considered a boat manufacturing facility for the purpose of this rule. [See definition for fiberglass boat manufacturing.]
- (6) Catalyst A substance that is added to Resin to initiate or promote polymerization. [Derived from SJVUAPCD Rule 4684 §3.8.]
- (7) Clear Gel Coat A Gel Coat that is clear or translucent so that underlying colors are visible. Clear Gel Coat is used to manufacture parts for sale. Clear Gel Coat does not include Tooling Gel used to build or Repair Molds. [Derived from SJVUAPCD Rule 4684 §3.11.]
- Closed Molding System A method of fabricating composite parts by placing composite materials in a confining mMold cavity and applying pressure and/or heat. The pressure may be clamping pressure, fluid pressure, atmospheric pressure, or vacuum pressure used either alone or in combination. The Mold surfaces may be rigid or flexible. Closed Molding includes, but is not limited to, compression molding with sheet molding compound, infusion molding, Resin injection molding (RIM), vacuum-assisted Resin transfer molding (VARTM), Resin transfer molding (RTM), and vacuum-assisted compression molding. Processes in which a closed Mold is used only to compact saturated fabric or remove air or excess Resin from the fabric (such as in vacuum bagging) are not considered Closed Molding. Open molding steps, such as application of Gel Coat or Skin Coat layer by conventional open molding prior to a Closed Molding process are not Closed Molding. [Additional content derived from WWWW, CTG for Fiberglass Boat Manufacturing Materials, and SJVUAPCD Rule 4682 §3.12.]
- (96) <u>Corrosion-Resistant Materials</u> Polyester <u>FResin mMaterials</u> used to make products for corrosion resistant applications such as tooling, fuel or chemical tanks, <u>Bboat</u> hulls, pools and outdoor spas.
- (<u>107</u>) <u>Cure</u> To transform or polymerize material from a liquid state to a solid or semi-solid state in which the desired physical properties, including hardness, are achieved.
- (8) <u>Electrostatic Application</u> Charging of atomized coating droplets for deposition to a grounded substrate by electrostatic attraction. [Moved to District Rule 102.]
- (9) <u>Exempt Compound</u> Those compounds listed in 40 CFR 51.100(S)(1). [Moved to District Rule 102.]
- (110) Fiber Reinforced Plastic or Composite (FRP/C) Materials A mixture of Ppolyester FResin and Ffiber FReinforcement mMaterials.

- (124) <u>Fiber Reinforcement Materials</u> Multifilament of glass or other fibrous materials such as, carbon, boron, metal and amid <u>pP</u>olymers, which are used to reinforce plastic.
- (13) Fiberglass Boat A vessel in which either the hull or deck is built from a composite material consisting of a Thermosetting Polyester Resin matrix reinforced with fibers of glass, carbon, aramid, or other material. *Derived from VVVV NESHAP for Boat Manufacturing.*]
- (14) Fiberglass Boat Manufacturing Operations Facilities that manufacture hulls or decks of Boats from fiberglass, or build molds to make Fiberglass Boat hulls or decks. Facilities that manufacture solely parts of Boats (such as hatches, seats, or lockers), or Boat trailers, but do not manufacture Boat hulls or decks from fiberglass or build Molds to make Fiberglass Boats or hulls are not considered Fiberglass Boat Manufacturing. A facility that manufactures hulls or decks, or Molds for hulls or decks, and other Fiberglass Boat parts, including small parts such as hatches, seats, and lockers, is considered Fiberglass Boat Manufacturing. Fiberglass Boat Manufacturing operation include open molding Resin and Gel Coat Operations (these include Pigmented Gel Coat, Clear Gel Coat, Production Resin, Tooling Gel Coat, and Tooling Resin), Resin and Gel Coat mixing operations, and Resin and Gel Coat application equipment cleaning operations. [Derived from SJVUAPCD Rule 4684 §3.21, CTG for Boat Manufacturing Materials applicability.]
- (15) Filament Application A method of applying Resin to an open mold that involves feeding reinforcement fibers through a Resin bath and winding the Resinimpregnated fibers on a rotating mandrel. [Derived from SJVUAPCD Rule 4684 §3.22.]
- (1662) <u>Filled Polyester Resin Material</u> A material formulated by adding compatible filler(s) to <u>P</u>polyester <u>#Resin mMaterial(s) to change viscosity, density, shrinkage, or other physical properties. [VVVV language added.]</u>
- [173] <u>Filler</u> A finely divided inert (non-VOC) material, which may be added to the <u>FR</u>esin to enhance its mechanical properties and extend its volume. Resin <u>F</u>fillers include, but are not limited to, silica, carbon black, talc, mica and calcium carbonate.
- (184) <u>Fire Retardant Materials</u> Polyester <u>FR</u>esin <u>mM</u>aterials used to make products that are resistant to flame or fire. <u>[WWWW]</u>
- (1915) Flowcoater A non-atomizing application technique of applying FResins and gGel eCoats to an open mold with a fluid nozzle in a fan pattern with no air supplied to the nozzle.

- (20) Fluid Impingement Technology A spray gun that produces an expanding non-misting curtain of liquid by the impingement of low-pressure uninterrupted liquid streams. [Derived from WWWW and SJVUAPCD Rule 4684 §3.26.]
- (2116) Gel Coat A ‡Thermosetting Ppolyester ‡Resin surface coating containing styrene or methyl methacrylate, either pigmented or clear, that provides a cosmetic enhancement and improves resistance to degradation from exposure to the elements. Gel Coat layers do not contain any reinforcing fibers and Gel Coats are applied directly to Mold surfaces or to a finished laminate. [VVVV language added for clarity.]
- (2217) General Purpose Polyester Resins Resin materials that are not Ceorrosion–Rresistant, Fire rRetardant, high strength, or gGel eCoats.
- (2318) Grams of Voc VOC Per Liter of Material The weight of VOC per volume of material, calculated using the formula in subsection (E)(1)(a).
- (2419) <u>Hand Lay-Up</u> Hand application technique of composite materials using a bucket and a paint brush or a paint roller, or other hand held method of application.
- (250) <u>High-Strength Materials</u> Polyester <u>FR</u>esins which have casting tensile strength of 10,000 psi or more and which are used for manufacturing of high performance products, including <u>B</u>boats and skis. <u>[Resins, or gel coats that requires high strength resin, for products that have high strength requirements pursuant to <u>WWWW.]</u></u>
- (21) <u>High-Volume, Low-Pressure (HVLP)</u> A coating application system which is operated at air pressures between 0.1 and 10 pounds per square inch gauge (psig) measured dynamically at the center of the air cap and at the air horns. [Moved to District Rule 102.]
- (262) <u>Lamination Resins</u> Orthophthalate, isophthalate and dicyclopentadiene (DCPD) <u>FR</u>esins which are used in composite system made of layers of reinforcement fibers and <u>FResins</u>, such as in <u>Bb</u>oat fabrication.
- (27) Manual Application The application of Resin to an Open Mold using a Hand

  Lay-Up technique. Components of successive plies of Resin-impregnated
  reinforcement fibers are applied using hand tools such as brushes and rollers. The
  use of Pressure-Fed Rollers and Flowcoaters to apply Resin to glass
  reinforcements that are then applied by hand to the Mold is not considered
  Manual Resin Application. [Derived from SJVUAPCD Rule 4684 §3.34.with
  additional language added for clarification pursuant to industry comment.]
- (283) <u>Marble or Cultured Resins</u> Orthophthalate and modified acrylic isophthalate rResins, which are designed for the fabrication of cast products, such as vanities.

- (29) Mold The cavity or surface into or on which Gel Coat, Resin, and fibers are placed and from which finished fiberglass parts take their form. [Derived from WWWW and SJVUAPCD Rule 4684 § 3.37.]
- (3024) Monomer A volatile organic compound VOC that partially combines with itself, or other similar compounds, by a cross-linking reaction to become a part of the Ceured FResin. Monomers include, but are not limited to, styrene and methyl methacrylate.
- (3125) Monomer Percent by Weight of a Filled Resin as Applied The weight of the mMonomer, divided by the weight of the polymer and Ffiller(s).
- (3226) Monomer Percent by Weight of a Resin The weight of the mMonomer, divided by the weight of the pPolymer.
- (3327) Non-Atomizing Spray Application Any application technique in which #Resin flows from the applicator, in a steady and observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices. Non-Aatomized ResinA-application technology includes, but is not limited to, fflowcoaters, chopper fflowcoaters, pressure fed fresin rollers, fresin flmpregnators, Fluid Impingement Technology applicators. Non-Atomizing application of Resin to glass reinforcements that are then applied by hand to the Mold are considered to be Non-Atomizing resin application and hand application. [Additional language added for clarification pursuant to industry comment.]
- (34) Open Molding Resin and Gel Coat Process A process in which the reinforcing fibers and Resin are placed in the mold and are open to the surrounding air while the reinforcing fibers are saturated with Resin. For the purpose of this rule, open molding includes operations in which a vacuum bag or similar cover is used to compress the uncured laminate to remove bubbles or excess Resin, or to achieve a bond between core material and a laminate. [Derived from SJVUAPCD Rule 4684 §3.47.]
- (3528) Open Molding System A process for fabricating composites in a way that Polyester Resin Materials are exposed to the atmosphere. Open molding includes processes such as manual resin application, mechanical resin application, filament application, and gel coat application. Open molding also includes application of resins and gel coats to parts that have been removed from the open mold. A method of fabricating composite parts by applying gel coats, resins, fibers, and other composite materials on an open mold using either hand lay up or spray up applications. [Derived from WWWW. "Mend damage" included from previous version of definition to clarify that repair may occur subsequent to fabrication, to address comment from industry.]
- (3629) Overall Control Efficiency (CE) The ratio, expressed as a percentage, of the weight of VOC removed by the emission control system to the total weight of

- VOC emitted from the Polyester Resin Operation, both measured simultaneously, calculated pursuant to the formula found in subsection (E)(1)(b).
- (37) Pigmented Gel Coat Opaque Gel Coat that does not contain ten percent (10%) or more titanium dioxide by weight used to manufacture parts for sale. Pigmented Gel Coat does not include Tooling Gel used to build or Repair Molds. [Derived from VVVV, WWWW, and SJVUAPCD Rule 4684 §3.50.]
- (380) Pin-Striping A spray application technique used to apply one or more narrow bands, marks, or streaks of gGel eCoat onto the surface of an open mold of a composite product.
- (3931) Polyester A pPolymer of ester molecules, which are formulated by the reaction of an acid and an alcohol and linked together by the ester linkages.
- (4032) Polyester Resin Materials Polyester Resins, such as isophthalic, orthophthalic, halogenated, bisphenol A, vinyl ester, or furan Resins; cross-linking agents; Ceatalysts; Gel eCoats; inhibitors; accelerators; promoters; and any other material containing VOC used in sPolyester Resin Operations. [Typographical error corrected.]
- (4133) Polyester Resin Operations Fabricate, rework, #Repair, or touchup products for commercial, military, or industrial use by mixing, pouring, hHand lLay-uUp, impregnating, injecting, forming, winding, spraying, and/or curing with fiberglass, Fillers, or any other reinforcement materials and associated cleanup.by using polyester resin materials.
- (4234) <u>Polymer</u> A chemical compound, such as polystyrene, comprised of a large number of chemical units (mMonomer) composed of identical crosslinking groups, such as styrene.
- (43) Polyputties Polyester Resin Putties used for assembling fiberglass parts.

  [Definition added pursuant to USEPA comment.

  https://www3.epa.gov/region1/topics/air/sips/me/ME\_ch162.pdf as used in

  Applicability, but not defined. Also used but not defined in 40 CFR 63 subpart

  VVVV]
- (4435) <u>Pressure-Fed Roller</u> A fabric roller that is fed with continuous supply of catalyzed <u>FR</u>esins from a mechanical fluid pump.
- (4536) Primer Gel Coat Gel eCoat that is used to coat the surface of composite parts, prior to top-coat painting, for automotive, aerospace, marine and home building industries.
- (46) Production Resin A General Purpose Polyester Resin or Gel Coat Material that is not especially Corrosion-Resistant, Fire Retardant, or High-Strength. [Derived from SJVUAPCD Rule 4684 §3.54.]

- (4737) Pultrusion A process where continuous roving strands are moved through a strand-tensioning device into a FResin bath for impregnation and then passed through a heated die for curing. There are several types of Pultrusion equipment such as open bath, Resin injection, and direct die injection equipment.

  [Additional clarification derived from VVVV.]
- (48) Putty(ies) A thickened mixture of polyester resin made by adding fillers, thixotrophs and reinforcing fibers used in the joining of one fiberglass, metal, foam or wood part to another to form a temporary or permanently bonded assembly. [Added definition Pursuant to USEPA comment. http://www.premix.com/why-composites/ind-term-composites.php, and rewording from definition of Assembly Adhesive from 40 CFR 63 subpart VVVV. Used but not defined in VVVV.]
- (4938) Repair Application of resin or gel coat to a part to correct a defect or mend damage, where the resin or gel coat application occurs after the part has gone through all the steps of its typical production process, or the application occurs outside the normal production area. For purposes of this definition, rerouting a part back through the normal production line, or part of the normal production line, is not considered repair. That portion of the fabrication process that requires the addition of polyester resin materials to portions of a previously fabricated product in order to mend damage. [Derived from WWWW. "Mend damage" included from previous version of definition to clarify that repair may occur subsequent to fabrication, to address comment from industry.]
- (5039) Resin Any <u>t</u>Thermosetting <u>p</u>Polyester <u>r</u>Resin, which is used to encapsulate and bind together reinforcement fibers and/or <u>F</u>fillers in the formulation of composite materials.
- (51) Resin and Gel Coat Operation An operation in which Resin or Gel Coat, including the mixing of putties or polyputties, is combined with additives thet include, but are not limited to, Fillers, promoters, or Catalysts. [Derived from SJVUAPCD Rule 4684 §3.60.]
- (5240) <u>Resin Impregnator</u> A mechanical non-atomizing composite materials application technique in which fiber reinforcement is saturated with -rResins in a controlled ratio for each specific composite product.
- (53) Skin Coat A layer of resin and fibers applied over Gel Coat to protect the Gel

  Coat from being deformed by the next laminate layers. [Derived from VVVV and SJVUAPCD Rule 4684 §3.62.]
- (<u>5441</u>) <u>Solid Surface Resins</u> Resins, which are used without <u>gG</u>el <u>eC</u>oats to fabricate homogenous solid surface products.

- (42) <u>South Coast Air Quality Management District (SCAQMD)</u> The air district created pursuant to Division 26, Part 3, Chapter 5.5 of the Health & Safety Code (commencing with §40400). [Moved to District Rule 102.]
- (<u>5543</u>) <u>Specialty Gel Coats</u> Gel <u>eC</u>oats which are used in conjunction with <u>fF</u>ire <u>fR</u>etardant, <u>Ceorrosion-Resistant or <u>hHigh-sS</u>trength <u>mM</u>aterials.</u>
- (56) Specialty Resin A halogenated, furan, bisphenol A, vinyl-ester, or isophthalic Resin used to make products for exposure to one or more of the following extreme environmental conditions: acute or chronic exposure to corrosive agents, caustic agents, acidic agents, or flame. [Derived from SJVUAPCD Rule 4684 §3.67.]
- (<u>5744</u>) <u>Thermosetting Polyester Resin</u> A <u>FR</u>esin material that undergoes a chemical reaction during curing and cannot be reshaped.
- (58) Tooling Gel Coat The Gel Coat used to build or Repair Molds (also known as tools) or prototypes (also known as plugs) from which Molds will be made.

  [Derived from VVVV, WWWW and SJVUAPCD Rule 4684 §3.69.]
- (59) Tooling Resin The Resins used to build or Repair Molds (also known as tools) or prototypes (also known as plugs) from which the Molds will be made.

  [Derived from VVVV, WWWW and SJVUAPCD Rule 4684 §3.70.]
- (45) <u>Touch-Up</u> That portion of the process that is necessary to cover minor imperfections. [Moved to District Rule 102.]
- (6046) <u>Tub/Shower Resins</u> Dicyclopentadiene (DCPD) <u>FR</u>esins, along with orthophthalate and isophthalate <u>FR</u>esins, which are used to fabricate bathware products.
- (6147) <u>Vapor Suppressed</u> A polyester <u>FR</u>esin or <u>gG</u>el <u>eC</u>oat material which contains additives to reduce VOC evaporation loss to less than fifty (50) grams per square meter of surface area as determined and certified by <u>FR</u>esin and <u>gG</u>el <u>eC</u>oat manufacturers.
- (62) Vinylester Resin A Thermosetting Polyester Resin containing esters of acrylic or methacrylic acids having a double-bond and ester linkage sites at the end of the Resin molecules. [Derived from VVVV and SJVUAPCD Rule 4684 §3.74.]
- (63) White and Off-White Gel Coat A Gel Coat that contains ten percent (10%) or more titanium dioxide by weight. [Derived from WWWW.]
- (48) <u>Volatile Organic Compound (VOC)</u> Any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions and those compounds listed in 40 CFR 51.100(s)(1). [Contained in District Rule 102.]

# (C) Requirements

[Derived from SJVUAPCD Rule 4684 5.1, CTG for Fiberglass Boat Manufacturing, and VVVV.]

- (1) An operator of a Polyester Resin Operation shall comply with one of the following process or control requirements:
  - (a) Use materials in an Open Molding process that comply with the limits in Table 1. In addition to complying with Table 1 limits, the non-Monomer VOC content of each Resin and Gel Coat shall not contain more than five percent (5%) by weight of the Resin or Gel Coat; or comply with subsections (C)(1)(b), (C)(1)(c), or (C)(1)(d). [In addition to complying with the monomer VOC content limit, each resin and gel coat must not contain more than 5% by weight non-monomer VOC content.]

Table 1*		
Monomer Content for Open Molding Resin and Gel Coat		
	Weight Average Monomer VOC content	
<u>Material</u>	(weight percent) limit	
General Purpose Polyester Resin	_	
Marble Resin	10 % (32% as supplied, no Fillers)	
Solid Surface Resin	<u>17%</u>	
Tub/Shower Resin	24% (35% as supplied, no Fillers)	
<u>Lamination Resin</u>	31% (35% as supplied, no Fillers)	
Tooling Resin	_	
Atomized (spray)	<u>30%</u>	
Non-atomized	<u>39%</u>	
Specialty Resin [Category added]		
and adjusted for consistency with		
more recently adopted neighboring <u>District RACT rules.</u> ]		
Fire Retardant Resin	38%	
Corrosion-Resistant and/or		
High Strength Resin (CR/HS)	_	
Mechanical (non-atomizing)	<u>46.2%</u>	
Filament Application	<u>42%</u>	
Manual Application	<u>40%</u>	
Corrosion Resistant	<u>48%</u>	
All other Resin	<u>35%</u>	
Tooling Gel Coat	<u>40%</u>	
Pigmented Gel Coat	_	
White and Off -White	<u>30%</u>	
Non-white	<u>37%</u>	
<u>Primer</u>	<u>28%</u>	
Clear Gel Coat	_	
Marble Resin	<u>40%</u>	
Other Resin	44%	
Specialty Gel Coat	<u>48%</u>	

<sup>\*</sup>Facilities that apply High Strength Resins using non-atomized mechanical application may use the same resin for manual application during product assembly and/or reinforcement tie-ins, provided that the High Strength Resin used for both application methods does not exceed the 46.2% monomer content limit. [Footnote added pursuant to industry comment. Certain products need to be manufactured using different application methods, but certification organizations require the manufacturing materials to be the same. Consistent with WWWW footnotes.]

- (b) Use Resin containing a vapor suppressant, such that the weight loss from the VOC emissions does not exceed 50 grams per square meter of exposed surface during Resin polymerization; or
- (c) Use a Closed-Mold system; or
- (d) Install and operate a VOC control system which meets all of the requirements of subsections (C)(1)(d)(i), (C)(1)(d)(ii), and (C)(1)(d)(iii) during periods of emission producing activities.
  - (i) The VOC emission control system shall be approved, in writing, by the APCO.
  - (ii) The VOC emission control system shall have an overall capture and control efficiency of at least 90 percent by weight, demonstrated using the applicable test method(s) in Section (E).
  - (iii) The VOC emission control system shall reduce VOC emissions, at all times, to a level not greater than the emissions that would have been achieved through the use of compliant materials, compliant equipment, or compliant work practices, as applicable.
- Resins and Gel Coats used for Touch-up, Repair, or small jobs, may have a Monomer content limit up to ten percent (10%) more than the applicable limit in Table 1. Such Resins or Gel Coats shall only be applied by a hand-held atomized spray gun which has a container no larger than one (1) quart for the Resin or Gel Coat as part of the gun. Resins or Gel Coats applied by another method shall comply with the applicable limit in Table 1. Total material use for all small jobs at a facility shall not exceed two (2) gallons per day. [Derived from SJVUAPCD Rule 4684 § 5.1.1.6 and MDAQMD Rule 1162 §(C)(4).]
- (f) Complying formulations shall not be thinned or diluted with any VOC containing material or changed in any manner that may increase VOC emissions after testing, but prior to or during application. [Relocated from (C)(2)(b).]

### (12) Application Technique

- (a) Except for <u>gG</u>el <u>eC</u>oats, a person shall not apply any <u>FR</u>esin materials to an open <u>mM</u>old surface subject to the provisions of this rule unless one of the following non-atomizing application techniques is used and operated according to the manufacturer's specifications:
  - (i) Non-atomizing Spray Application technique;
  - (ii) Flowcoaters;
  - (iii) Pressure-Fed Rollers;
  - (iv) Resin Impregnators:
  - (v) Hand Lay-Up applications; or

- (vi) Other non-atomizing application techniques which have transfer efficiencies at least equal to one of the above methods, and which are used in a manner that the parameters under which they were tested are permanent features of the method. Prior to their use, such application shall be approved in writing by the APCO, CARB, and the USEPA.
- (b) An operator shall not apply <u>gG</u>el <u>eC</u>oat materials to any open <u>mM</u>old surface subject to the provisions of this rule unless one of the following application techniques is used and operated according to the manufacturer's specifications:
  - (i) Any non-atomizing application technique listed in <u>subsection</u> (C)(2+)(a);
  - (ii) Airless;
  - (iii) Air-Assisted Airless Spray;
  - (ivii) Electrostatic Attraction; or
  - (iv) High-Volume, Low-Pressure (HVLP).
    - a. HVLP spray equipment shall be operated in accordance with the manufacturer's recommendations.
    - b. HVLP spray guns shall have the maximum inlet air pressure in psig at which the gun will operate within the parameters specified in Rule 102 Definitions of Terms indicated on the spray gun. [Derived from SJVUAPCD §5.1.2.3.]
- (c) In lieu of complying with the applicable requirements of subsection (C)(2), an operator may install and maintain a VOC emission control system that meets the requirements of subsection (C)(1)(d) around the coating application equipment. [Derived from SJVUAPCD Rule 4684 §5.1.3.]
- (2) Material Requirements
  - (a) A person shall not use polyester resin material in an Open Molding System that has a monomer content in excess of the limits specified in Table 1. [Relocated to (C)(1)(a).]

#### Table 1

Polyester Resin Materials [Contents of Table 1 have been reorganized to proposed Table 1 and Table 2, separating general Polyester Resin Operations and Fiberglass Boat

Operations, although Table 1 has some boat applicability as with Corrosion Resistant and High Strength materials by definition.]

Polyester Resin Material	<b>Monomer Content</b>
Clear Gel Coat	
For Marble Resins	40

For Other Resins	44
Boat Manufacturing	48
Pigmented Gel Coat	
White and Off-White	<del>30</del>
Non-White Boat Manufacturing	<del>33</del>
Non-White Other	<del>37</del>
<del>Primer</del>	<del>28</del>
Specialty Gel Coats	48
General Purpose Resin	
Modula Davion	<del>10 or</del>
Marble Resins	(32% as supplied, no fillers)
Solid Surface Resins	<del>17</del>
T. 1 /C1 D.	<del>24 or</del>
Tub/Shower Resins	(35% as supplied, no fillers)
Tanain Air a Daring	31 or
Lamination Resins	(35% as supplied, no fillers)
Fire Retardant Resin	<del>38</del>
Corrosion Resistant and/or High Strength Resin	
Mechanical (non-atomizing)	4 <del>6.2</del>
Filament application	<del>42</del>
Manual application	40
Other Resins	<del>35</del>
Boat Manufacturing (Atomized)	<del>28</del>
Boat Manufacturing (Non-atomized)	<del>35</del>

- (b) Complying formulations shall not be thinned or diluted with any VOC containing material or changed in any manner that may increase VOC emissions after testing, but prior to or during application. [Relocated to (C)(1)(f).]
- (c) In lieu of complying with the monomer percentage limitations in Table 1, air pollution control equipment with a capture and control system Overall Control Efficiency of at least 85 percent, as determined pursuant to subsections (E)(1)(b) and (E)(1)(d) of this rule may be used. [Relocated to (C)(1)(d) and revised to meet current federal RACT limit as set forth in SJVUAPCD Rule 4684 §5.1.1.5.]
- (d) A person shall not apply to an Open Molding System any Tub/Shower Resin material unless all the applied resin material is vapor suppressed.

  [Relocated to (C)(1)(b) and revised to meet current federal RACT limit as set forth in from SJVUAPCD Rule 4684 § 5.1.1.3.
- (3) Fiberglass Boat Manufacturing Operation [Derived from SJVUAPCD §5.2.]

An operator of a Fiberglass Boat Manufacturing Operation shall comply with one of the following process or control requirements:

### (a) Requirements for Closed Molding Process

(i) An operator of a Fiberglass Boat Manufacturing Facility which uses a Closed Molding process shall comply with the applicable requirements of subsections (C)(1), (C)(4), (C)(5) and Sections (D) and (E).

# (b) Requirement for Compliant Materials

(i) An operator subject to (C)(3) shall not use any materials in an Open Molding process that exceed the limits in Table 2. In addition to complying with Table 2 limits, the non-Monomer VOC content of each Resin and Gel Coat shall not contain more than five percent (5%) by weight of the Resin or Gel Coat

Table 2 [Limits derived from Subpart VVVV]			
Monomer VOC Limits for Open Molding Resin and Gel Coat for			
<u>Fiberglass Boat Manufacturing Operations</u>			
	<u>Application</u>	Weight Average Monomer VOC content	
<u>Material</u>	<u>Method</u>	(weight percent) limit	
<u>Production Resin</u>	Atomized (spray)	<u>28%</u>	
<u>Production Resin</u>	Non-atomized	<u>35%</u>	
Pigmented Gel Coat	Any method	33%	
Clear Gel Coat	Any method	48%	
Tooling Resin	Atomized (spray)	<u>30%</u>	
Tooling Resin	Non-atomized	<u>39%</u>	
Tooling Gel Coat	Any method	40%	

## (c) Requirements for Add-on VOC Control System

(i) In lieu of complying with limits of Table 2, an operator may install and operate a VOC control system which meets all of the requirements of subsections (C)(1)(d) during periods of emission producing activities.

### (43) Process Requirements

- (a) A person shall not operate a Closed Molding System, unless the weight loss of <u>pP</u>olyester <u>FR</u>esin <u>mM</u>aterials during polymerization is less than four (4) percent.
- (b) A person shall not perform a Pultrusion operation, unless wet-out Resin baths are covered except for 18 inches from the exit of the bath to the die. The weight loss of Polyester Resin Materials during polymerization

shall be no less than three (3) percent in a <u>Ppultrusion</u> operation. <u>[Consistent with definition for "Pultrusion".]</u>

- (4) Notwithstanding the requirements specified in section (C)(1)(a), a person may perform touch up and repair using a hand-held spray gun that has a container no larger than 1 quart for gel coat or resin as part of the gun. [See proposed section (C)(1)(e).]
- (55) Work Practice Standards [Additional language derived from SJVUAPCD §5.2.2.8 for consistency.]
  - Any person processing <u>pP</u>olyester <u>rResin mM</u>aterials and any other VOC containing materials, <u>including putties</u> and <u>polyputties</u>, shall keep these materials in closed containers <u>with tightly fitting lids</u>, except when <u>manually</u> filling or emptying the container, <u>or when mixing or pumping</u> equipment is being placed in or removed from a container.
- (6) Organic Solvent Cleaning Requirements [Revised to meet current federal RACT limit as set forth in SJVUAPCD Rule 4684 §5.3.]

A person shall not use VOC-containing materials for cleaning or clean-up, excluding-coating stripping equipment cleaningmold sealing and release agents, mold stripping and cleaning, cleaners used to clean cured resin from Application Equipment, and closed systems, unless: [Specifically exempted in WWWW §63.5790(c).]

- (a) The VOC content composite partial pressure is 45 mm Hg or less at a temperature of 20 degrees C, or
- (b) The material contains 2500 grams or less of VOC content per liter of material (0.21 pounds per gallon), as applied.
- (c) In lieu of complying with the VOC content limits in (C)(6)(a) or (C)(6)(b), an operator may control VOC emissions from cleaning operations with an approved VOC emission control system that meets the requirements of subsection (C)(1)(d) for the solvent cleaning operations.
- (7) Prohibition of Specification
  - (a) No person shall solicit or require for use or specify the application of a pPolyester rResin mMaterial, or part or component thereof, if such use or application results in a violation of the provision of this rule. The prohibition of this subsection shall apply to all written or oral contracts under the terms of which any pPolyester rResin mMaterial, or any part or component, subject to the provisions of this rule is applied at any physical location within the District.

#### (8) Prohibition of Sale

A person shall not offer for sale or sell within the District any pPolyester Resin mMaterial that does not meet the VOC content limits as set forth in Table 1, 2 or 3 of this rule. The prohibition of this section shall apply to the sale of any pPolyester Resin Mmaterial which will be applied at any physical location within the District, except those materials specifically exempted in as an Exempt Compound as defined in Rule 102 – Definition of Terms section (B)(9) and Section (C) of this rule.

#### (9) Compliance Statement Requirement

(a) The manufacture of materials subject to this rule shall include a designation of VOC as supplied on data sheets; including material components, expressed in grams per liter or pounds per gallon, excluding water and exempt compounds.

# (D) Monitoring and Records

#### (1) Material Records

- (a) A person subject to the provisions of this rule (or, A-a person subject to section Section (C) or claiming exemption under subsection (A)(3)) shall maintain daily records. Alternately, records may be kept on a monthly basis provided the polyester resin process or equipment is not subject to a daily production limit or daily VOC limit in any applicable district rule(s) or permit(s). The records shall contain the following information, if applicable:
  - (i) The type of non-atomizing, or other in the case of gGel eCoat, application technique(s) used, manufacturer's name, and records of the fluid tip pressure calibration as specified by the manufacturer;
  - (ii) A current list of <u>pP</u>olyester <u>rR</u>esin <u>mM</u>aterials in use which provides the material data necessary to evaluate compliance, including the following information, if applicable:
    - 1. The manufacturer's name:
    - 2. The type and amount of each of the pPolyester Resin mMaterials used;
    - 3. The weight (in percent) of <u>mM</u>onomer for all <u>pP</u>olyester <u>rResin mMaterials</u> and <u>fFiller(s)</u>;
    - 4. If VOC-containing materials are added to the <u>pP</u>olyester <u>FR</u>esin <u>Materials</u>, the amount of VOC-containing materials, in liters, and the VOC content in grams per liter, of VOC-containing materials.
  - (iii) Certifications of analysis from the Polyester FResin manufacturer(s) to verify that all applied tub/shower Polyester

- $\mathbf{F}$ Resin materials are  $\mathbf{F}$ Vapor  $\mathbf{S}$ Uppressed as applicable. [Applies to any applicable polyester resin materials. See  $\S(C)(1)(b)$ .]
- (iv) For closed  $\underline{\mathbf{mM}}$  old and  $\underline{\mathbf{Pp}}$  ultrusion systems, the weight loss (in percent) of  $\underline{\mathbf{pP}}$  olyester  $\underline{\mathbf{rR}}$  esin  $\underline{\mathbf{mM}}$  aterials for each application.
- (b) Records for solvents used in cleanup and preparation: [Updated for clarity.]
  - (i) Type and quantity of all cleaning materials;
  - (ii) VOC content of all cleaning material used and stored.-
- (2) Compliance Assurance Monitoring
  - (a) Each Coating Application Operation subject to subparagraph (C)(1) which is using air pollution abatement equipment to meet the control requirement shall:
    - (i) Utilize Compliance Assurance Monitoring, as approved by the APCO. Each monitoring device(s), mechanism and/or technique shall be calibrated/maintained as recommended by the manufacturer; and
    - (ii) Maintain and produce daily records of key system operating parameters and maintenance procedures which will demonstrate continuous operation and compliance of the air pollution abatement equipment during periods of emissions-producing activities. Key system operating parameters are those necessary to ensure compliance with VOC content of coating requirements, such as temperatures, pressures and flow rates.
  - (b) Compliance with subsection (C)(1) shall be determined by compliance testing as prescribed in subsection (E)(2) and/or by evaluating Compliance Assurance Monitoring data.
- (3) All records for the previous five (5) year period maintained and produced pursuant to this Section shall be retained and available for inspection by the APCO upon request.
- (E) Compliance Procedures and Test Methods
  - (1) Calculation Methods

The following test methods and procedures shall be used to determine compliance with this rule. Other applicable test methods may be used if they are determined to be equivalent and approved in writing by the APCO, CARB and the USEPA.

(a) Grams of VOC Per Liter of Material shall be determined by the following equation:

$$G_{v} = \frac{W_{s} - W_{w} - W_{es}}{V_{m}}$$

Where:

G<sub>v</sub> = Grams of VOC per liter of coating less water and less Exempt Compounds

W<sub>s</sub> = weight of volatile compounds in grams

 $W_w$  = weight of water in grams

Wes weight of Exempt Compounds in grams

 $V_m$  = volume of material in liters

(b) Overall Control Efficiency shall be determined by the following equations

$$CE = \frac{(W_c - W_a)}{W_a} x 100$$

$$CE = \frac{(Capture Efficiency)x(Control Device Efficiency)}{100}$$

Where:

W<sub>c</sub> = weight of VOC entering control device

W<sub>a</sub> = weight of VOC discharged from the control device

W<sub>e</sub> = weight of VOC emitted, determined by the appropriate USEPA calculation in 40 CFR 63, Subpart VVVV, or 40 CFR 63, Subpart WWWW, or any other method approved by the APCO, CARB, and the USEPA

- (c) Determination of VOC content of VOC-containing materials
  - (i) United States Environmental Protection Agency (USEPA)
    Reference Method 24 (40 CFR 60, Appendix A) for VOC content
    and ASTM D4457-85, or CARB Method 432 for determination of
    Exempt Compounds. The Exempt Compound content shall be
    determined by SCAQMD Method 303 *Determination of Exempt*Compounds contained in the SCAQMD "Laboratory Methods of
    Analysis for Enforcement Samples" manual; or,

- (ii) SCAQMD Method 302 and 303 Determination of Exempt Compounds.
- (iii) SCAQMD Method 304 Determination of Volatile Organic Compounds (VOCs) in Various Materials, or any other applicable method approved by the SCAQMD, CARB, and the USEPA.
- (iv) SCAQMD Method 309 Determination of the Weight Loss of Polyester Resin Materials.
- (v) SCAQMD Method 312 Determination of Monomer Content of Polyester Resins.
- (vi) SCAQMD Method 313 Determination of Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry.
- (d) Determination of Efficiency of Emission Control System
  - (i) The efficiency of the collection device of the emission control system as specified in paragraph (C)(12)(de) shall be determined by the USEPA method cited in 55 Federal Register 26865 (June 29, 1990)according to USEPA's "Revised Capture Efficiency Guidance for Control of Volatile Organic Compound Emissions" (February 7, 1995) and 40 CFR 51 Appendix M, Test Methods 204-204F, as applicable, or any other method approved by the APCO, CARB, and the USEPA. [Derived from The Little Bluebook, and SJVUAPCD Rule 4684 §6.2.2.1.]
  - (ii) The efficiency of the control device of the emission control system as specified in paragraph (C)(21)(ed) and the VOC content in the control device exhaust gases, measured and calculated as carbon, shall be determined by using: [Updated to reflect most current approved changes made to Rule 1104 as amended 03/27/17.]
    - a. USEPA Test Methods 25 <u>Determination of Total</u>

      <u>Gaseous Nonmethane Organic Emissions as Carbon</u>;
    - b. EPA Method 25A Determination of Total Gaseous
      Organic Concentration Using a Flame Ion Analyzer, 5
    - c. or SCAQMD Method 25.1 Determination of Total Gaseous Non-Methane Organic Emissions as Carbon February 1991); or as applicable.
    - d. SCAQMD Test Method 25.3 Determination of Low Concentration Non-Methane Non-Ethane Organic Compound Emissions from Lean Fueled Combustion Sources (March 2000).
- (e) Determination of Exempt Compounds Exempt Compound content shall be determined by using: [Updated to reflect most current approved changes made to Rule 1104 as amended 03/27/17.]
  - (i) USEPA Test Method 18 Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

- (ii) , or ARB Method 422 "<u>Determination of Volatile Organic</u>

  <u>Compounds in Emissions form Stationary Sources</u>" (January 22,

  1987) shall be used to determine emissions of Exempt Compounds.
  - a) It is only approved for the compounds listed in Method 422, section 2, that have been exempted from USEPAs definition of VOC; and
  - b) If aqueous impingers are used, the solution also shall be analyzed for the target VOCs; or
- (iii) SCAQMD Method 303-91, "Determination of Exempt Compounds" (February 1993).
- (e) Determination of Transfer Efficiency
  - (i) Demonstration of transfer efficiency of alternative application methods subject to subsection (C)(24)(a)(vi) shall be conducted in accordance with SCAQMDs "Spray Equipment Transfer Efficiency Test Procedure for Equipment User" (5/24/89).
- (f) The emission rate per square meter of exposed surface during polymerization of Polyester Resins is to be determined using SCAQMD Method 309 Static Method for Determination of Volatile Emissions from Polyester and Vinyl Resins Operations, Attachment A, 01/08/1991.

  [Derived from SJVUAPCD Rule 4684 § 6.2.1.]
- (2) All test methods referenced in this section shall be the most recently <u>USEPA</u> approved version. <u>[The most recent version of a test method is not always an acceptable version for inclusion in the SIP.]</u>
- (3) Alternative Test Methods
  - (a) Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with any provisions of this rule may also be used after review and approval in writing by the APCO, CARB and the USEPA.
- (4) Alternative Compliance Methods
  - (a) Alternative application processes and materials other than those listed in Section (C)(1) and (C)(2) may be used provided they result in an equivalent VOC emissions and are approved in writing by the APCO, CARB and the USEPA.
- (F) Violations
  - (1) Failure to comply with any provision of this rule shall constitute a violation of the rule.

- (2) A violation of the limits contained in this rule as determined by any one of these test methods shall constitute a violation of this rule.
- (3) When more than one test method or set of test methods are specified for any testing, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of the rule.

[SIP: See SIP Table at http://www.mdaqmd.ca.gov][SIP]